

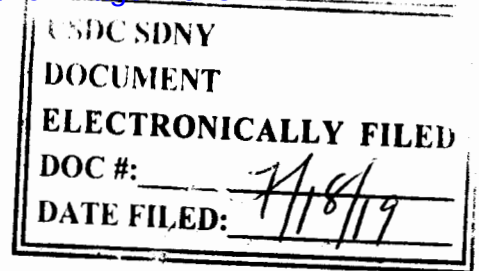
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

— against —

CHRISTIAN FIGALLO and KENYATTA
TAISTE,

Defendants.



18 CR 684 (VM)

ORDER

VICTOR MARRERO, United States District Judge.

Counsel for defendant Kenyatta Taiste, with consent of the Government, requests that the status conference currently scheduled for the above-named defendants for July 19, 2019, be adjourned. (See attached letter from Zachary Margulis-Ohnuma.) By separate letter, counsel for defendant Christian Figallo joins in the request for an adjournment. (See attached letter from David Cohen.) The conference shall be rescheduled to September 6, 2019 at 2:30 p.m.

Counsel for both defendants consent to an exclusion of time from the Speedy Trial Act until September 6, 2019.

It is hereby ordered that the adjourned time shall be excluded from speedy trial calculations. This exclusion is designed to guarantee effectiveness of counsel and prevent any possible miscarriage of justice. The value of this exclusion outweighs the best interests of the defendant and the public to a speedy trial. This order of exclusion of time is made pursuant to 18 U.S.C. §§ 3161(h)(7)(B)(i) & (iv).

Defendant Kenyatta Taiste further requests that the conditions of her release be modified to remove the condition of home detention and to impose a reasonable curfew as determined by Pretrial Services. The Government and Pretrial Services consent to this request. Accordingly, it is hereby ordered that the bail conditions of defendant Kenyatta Taiste herein are modified for the purposes and on the terms and conditions set forth in the attached letter.

SO ORDERED:

Dated: New York, New York
18 July 2019


Victor Marrero
U.S.D.J.

LAW OFFICE OF
ZACHARY MARGULIS-OHNUMA

July 16, 2019

Via fax

Hon. Victor Marrero
U.S. District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

RE: U.S. v. Taiste et al., 18 Cr. 684 (VM)

Dear Judge Marrero:

This office represents the defendant Kenyatta Taiste in the above-captioned case. I write to request an adjournment of the status conference scheduled for July 19, 2019 and to request a modification of Ms. Taiste's conditions of release. Both applications are made on consent of the government and pretrial services.

First, the parties jointly request a 45-day adjournment of the July 19, 2019 status conference. The parties request this adjournment to allow defense counsel additional time to review discovery and for continued plea negotiations. The government requests, and Ms. Taiste consents to, the exclusion of Speedy Trial time until the next scheduled conference.

Second, Ms. Taiste requests that the conditions of her release be modified to remove the condition of home detention and to replace it with a reasonable curfew as determined by pretrial services. Since Ms. Taiste's release on bail, she has obtained employment and been in full compliance with all conditions of her release. She has been and will remain on GPS location monitoring. Both the government and pretrial consent to this proposed modification of Ms. Taiste's release conditions.

Accordingly, I respectfully request that the status conference be adjourned to the week of September 2, 2019 and that Ms.

260 MADISON AVENUE, 17TH FLOOR • NEW YORK, NY 10016
(212) 685-0999 • ZACH@ZMOLAW.COM
WWW.ZMOLAW.COM

LAW OFFICE OF ZACHARY MARGULIS-OHNUMA

Taiste's conditions of release be modified to remove her from home detention and to replace that condition with a reasonable curfew to be determined by pretrial services.

Thank you for your attention to this case.

Very truly yours,

Zachary Margulis-Ohnuma

Zachary Margulis-Ohnuma

CC: All counsel of record (via email)
Pretrial Services Officer Carlos Ramirez (via email)



COHEN FORMAN BARONE, LLP
AN EXPERIENCED LAW FIRM

DAVID J. COHEN
david@cfblaw.com

CORY FORMAN
cory@cfblaw.com

CARLA A. BARONE
carla@cfblaw.com

SENIOR ASSOCIATE
BENJAMIN L. SIMPSON
ben@cfblaw.com

OF COUNSEL
ROBERT VENTURO
RICHARD COHEN
JEFFREY COHEN
RONALD COHEN

The Honorable Victor Marrero
United States Court Southern District of New York
500 Pearl St.
New York, NY 1007-1312

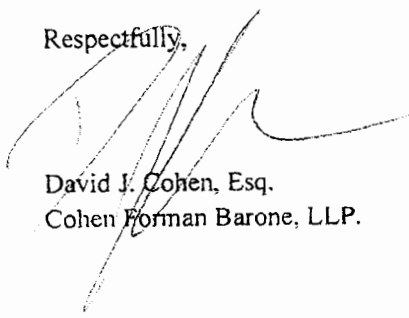
July 18, 2019

Re: United States v. Christian Figallo, 18 Cr. 684 (VM)
Co-counsel's Request for Adjournment

Dear Honorable J. Victor Marrero,

I am counsel representing the above-named defendant. Mr. Figallo is scheduled to appear with his codefendant tomorrow, July 19, 2019, before your Honor. It is my understanding that counsel for codefendant has made a request for a forty-five (45) day adjournment with time excluded. We have no objection to this request and we agree to the exclusion of time in accordance with the Speedy Trial Act.

Respectfully,


David J. Cohen, Esq.
Cohen Forman Barone, LLP.

Manhattan
Long Island

950 Third Avenue, 11th floor, New York, NY 10022
228 East Main Street, Patchogue, NY 11772

T. 212.766.9111
T. 631.766.9111

F. 212.766.9166
F. 212.766.9166